

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE**

VIRGINIA COLE <i>on behalf of herself and others similarly situated,</i>	)	Civil Action No.: 3:25-cv-00639
	)	
Plaintiff,	)	Class Action Complaint
	)	
v.	)	Jury Trial Demanded
	)	
GENSTONE ENTERPRISES, LLC	)	
	)	
Defendant.	)	
	)	

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**MOTION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE**

Plaintiff Virginia Cole respectfully moves this Court for an Order continuing the Initial Case Management Conference, currently scheduled to take place by telephone on August 6, 2025, at 9:00 AM, for a period of thirty (30) days.

As good cause for this request, Plaintiff states the following:

1. Defendant Genstone Enterprises, LLC was served with the Complaint on July 14, 2025.
2. As a result, Defendant's deadline to respond to the Complaint is August 4, 2025.
3. As of the date of this motion, no counsel has entered an appearance on behalf of Defendant, and Plaintiff's counsel has not been contacted by any attorney purporting to represent Defendant.
4. A brief continuance of the Initial Case Management Conference will allow time for Defendant to appear and for the parties to begin conferring regarding case management and scheduling obligations under Federal Rule of Civil Procedure 26(f).

WHEREFORE, Plaintiff respectfully requests that the Court extend the date of the Initial Case Management Conference by thirty (30) days, or to another date convenient to the Court.

Date: July 28, 2025

/s/ Anthony I. Paronich

Anthony I. Paronich, *pro hac vice*

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